

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

10/18/04 10:18 P 2:26

AETNA LIFE INSURANCE COMPANY,)	U.S. DISTRICT COURT
)	DISTRICT OF MASS
Plaintiff,)	
)	
v.)	Civil Action No. 04-11046-RGS
)	
MART T. COSMAN, and HARRY P.)	
COSMAN,)	
)	
Defendants.)	
)	

PROPOSED PRE-TRIAL SCHEDULE PURSUANT TO L.R. 16.1(D)

Pursuant to L.R. 16.1(B), the undersigned state that they have conferred for the express purpose of preparing a proposed pre-trial schedule for the case that includes a plan for discovery.

Based on their conference, the parties submit the following schedule for the Court's consideration:

The parties proposed agenda for:

a) Discovery; and

b) Trial date.

1. Initial disclosures served shall be served by November 15, 2004.
2. All written discovery, including requests to admit pursuant to Rule 36, shall be served by May 2, 2005.
3. All depositions of fact witnesses shall be completed by June 15, 2004.
4. All experts who may be witnesses on behalf of plaintiff shall be designated in accordance with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Massachusetts by July 29, 2005.

- 2 -

5. All experts who may be witnesses on behalf of defendant shall be designated in accordance with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Massachusetts by August 31, 2005.

6. All expert depositions shall be completed by September 19, 2005.

7. Dispositive motions, motions for leave to add parties and motions to change venue shall be filed by October 10, 2005.

8. Any Settlement Conference shall be held in accordance with the Court's schedule, after dispositive motions are decided.

9. A Final Pretrial Conference shall be held thereafter in accordance with the Court's schedule.

10. Phased Discovery: After consideration, the parties have determined that conducting phased discovery would be neither beneficial, nor desirable in this matter.

AETNA LIFE INSURANCE COMPANY
By its attorney,


Edward P. O'Leary, BBO #551932
Fitzhugh, Parker & Alvaro LLP
155 Federal Street
Boston, MA 02110
(617)695-2330

MARY T. COSMAN,
By her attorney,


David C. McBride, BBO #326910
Law Office of David C. McBride
19 Cherry Street
Danvers, MA 01923
(978) 777-7733

- 3 -

HARRY P. COSMAN,
By his attorney,


Georgia S. Curtis, BBO # 650214
Simms & Simms, LLP
53 Arlington Street
Brockton, MA 02301
(508) 588-6900

Dated: October 8, 2004